



California Stormwater Quality Association®

Dedicated to the Advancement of Stormwater Quality Management, Science and Regulation

April 17, 2020

Maureen Kerner
Associate Director
Environmental Finance Center at Sacramento State

Subject: Report – Estimating Benefits and Costs of Stormwater Management, Part II: Reported Costs in California

Ms. Kerner:

Thank you for the opportunity to review and provide comments on the subject report. It is our understanding that the draft report summarizes reported municipal stormwater management costs in California. And that the report is the product of the second part of a two-part project, the first part of which developed a guide on methods for benefit-cost analysis (BCA) of municipal stormwater projects and programs. Additionally, we understand that this comment letter may be included as an attachment to the report.

To provide more local perspective to our comments, CASQA took advantage of its connections in the municipal separate storm sewer system (MS4) community and sent the report to California Phase I and Phase II Stormwater Program Managers, the CASQA Board of Directors, and select CASQA Executive Program Committee members. Below is a compilation of comments received.

Summary of Comments

- Results should be properly qualified to note that data is not uniformly available across the state, and a relatively small sample size was used for parts of the analysis.
- Inconsistencies in the charts and tables should be examined to ensure all data is accurately reported.
- Efforts to promote and adopt standardized cost reporting categories should be considered carefully and with full engagement from regulated agencies.

Detailed Comments and Selected Figures

Challenges arise when generalizing and standardizing cost reporting data across jurisdictions and agencies.

- Many county MS4s already differentiate expenses between activities targeted for the unincorporated area and activities undertaken on behalf of all regional cities.
- While the categorization of costs that this framework used seems reasonable, it is important to stress the limitations of having someone unfamiliar with the individual agency data parse expenses into these categories.
- Costs associated with stormwater permit compliance appear to be mixed with those of drainage maintenance / flood control. The costs reported need to be separable so NPDES stormwater quality compliance costs may be isolated.

- The suggestion to better differentiate between flood control and water quality activities may be a challenge as some activities could be considered multi-beneficial. More guidance about how to do this would be appropriate.
- Any effort that adopts standardized reporting categories as requirements such as those suggested in Table 13 will require significant effort on behalf of agencies to re-align their data collection and reporting efforts.

Questions exist specifically about the accuracy of County of San Diego (COSD) data:

- According to Appendix C, expenditures data was available for 30 jurisdictions in Region 9; however, the sample size in Table 10 is only nine (9) jurisdictions.
- Figure 6 misrepresents Region 9 due to missing expenditure data. (Note Figure 6 shows estimated annual expenditures for the whole region at \$19M, while Figure 12 shows COSD alone as approximately \$30M)
- Contrary to the report, San Diego County's MS4 spending has increased over time.
- Too few jurisdictions' expenditures (only 9 in Region 9) were included so the conclusion that there was a poor correlation between expenditures and the jurisdictional population seems specious. (Although R^2 value for the region on Expenditures and Area was .4, much stronger than the other regions) Also, the referenced figure A2 seems to be missing.
- The "Expenditures by County Over Time" graph in Figure 12 is problematic on multiple levels.
 - The scale of the chart is too large and does not clearly depict the change in expenditures from year to year. If the scale were adjusted, the variability (both increasing and decreasing) of expenditures would be more apparent.
 - Data is missing for San Diego County from 2013-2014, yet this data is readily available. This makes it unclear what data sources are being used.

Thank you again for the opportunity to review the draft and provide comments. If you have any questions please contact me.

Sincerely,



Geoff Brosseau,
CASQA Executive Director

cc: CASQA Board of Directors
CASQA Executive Program Committee
Karen Cowan, CASQA Assistant Executive Director